

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

TONY AND MII'S, INC. §
TONY THANGSONGCHAROEN, and §
SOMNUEK THANGSONGCHAROEN § Case No. 3:17-cv-609-B
Plaintiffs, §
§
vs. §
§
UNITED STATES OF AMERICA, §
§
Defendant. §

**JOINT MOTION TO CONTINUE ORAL ARGUMENT [DKT. 55] PENDING
SETTLEMENT DISCUSSIONS FOR A TWO-WEEK PERIOD**

Plaintiffs Tony and Mii's, Inc., Tony Thangsongcharoen, and Somnuek Thangsongcharoen ("Tony and Mii's") and Defendant United States of America ("United States"), collectively the Parties, move the Court to continue the oral argument scheduled for Friday, February 8, 2019, at 9:00 a.m. [Dkt. #55] as to the United States' Amended Emergency Motion for Protective Order Pursuant to Fed. R. Civ. P. 26(c) and Brief [Dkt. #43], to allow the parties a two-week period to pursue new settlement negotiations that may eliminate the need for a determination with respect to the United States' motion.

The Further Additional Continuing Appropriations Act of 2019, H.J. Resolution 28, appropriating funds for the Department of Justice through February 15, 2019, was signed into law on January 25, 2019. Since January 28, 2019, the parties have been engaged, through their counsel, in meaningful and responsive settlement negotiations. Plaintiff's counsel requires additional time to confer with his clients. This cannot be accomplished, however, before the February 8, 2019 hearing. The Parties therefore respectfully request that the oral argument be reset to a date that is on or after two weeks from the original date for oral argument (February 8,

2019). A reset will allow the Parties an opportunity to resolve this case, and if able to do so, without utilizing the Court's time and resources for an oral argument and trial of this case.

CONCLUSION

The Parties move the Court to continue the oral argument set to be heard on February 8, 2019, as to the United States' motion [Dkt. 43], to a date that is on or after two-weeks from February 8, 2019.

/s/ Moha P. Yepuri
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COUNSEL FOR PLAINTIFFS

CERTIFICATE OF CONFERENCE

I certify that on February 6, 2019, I conferred with counsel for Plaintiffs, Jason B. Freeman, and he stated in writing that he joined in the above-stated motion.

/s/ Moha P. Yepuri
MOHA P. YEPURI

CERTIFICATE OF SERVICE

I certify, that on February 7, 2019, I filed the foregoing using the Clerk's ECF system which will serve an electronic copy on the following:

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/s/ Moha P. Yepuri
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